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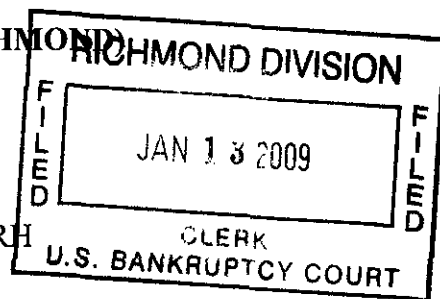
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA (RICHMOND)

IN RE

CIRCUIT CITY STORES, INC. et al.,
Debtors.

Chapter 11

Case No. 08-35653-KRH
(Jointly Administered)



VERIFIED STATEMENT OF MULTIPLE CREDITOR REPRESENTATION PURSUANT
TO BANKRUPTCY RULE 2019

I, Kenneth Miller, declare and state as follows:

1. I am an attorney at law licensed to practice law in the State of California and a partner with the law firm of Moldo Davidson Fraioli Seror & Sestanovich LLP ("Moldo Davidson"). I have personal knowledge of the facts set forth in this Statement and if called upon as a witness to testify, I could and would testify competently to the facts set forth below.
2. I, along with Byron Moldo, a Partner with Moldo Davidson, are the attorneys primarily responsible for representing the following creditors (collectively, the "Landlords") in connection with the above entitled case:

- (A) KB Columbus I-CC, LLC,
c/o Charles Dunn
Real Estate Services, Inc.
800 West Sixth Street, Fifth Floor
Los Angeles, California 90017-2709
Attn.: Florence Kang
- (B) The City Portfolio TIC, LLC
c/o Red Mountain Retail Group, Inc.
1234 East 17th Street
Santa Ana, California 92701
Attn: Carl Roude

- (C) KJF/Faris TIC, LLC
c/o Red Mountain Retail Group, Inc.
1234 East 17th Street
Santa Ana, California 92701
Attn: Carl Roude
- (D) Descanso TIC, LLC
c/o Red Mountain Retail Group, Inc.
1234 East 17th Street
Santa Ana, California 92701
Attn: Carl Roude
- (E) Centre At 38th Street TIC, LLC
c/o Red Mountain Retail Group, Inc.
1234 East 17th Street
Santa Ana, California 92701
Attn: Carl Roude
- (F) RMRG Portfolio TIC, LLC
c/o Red Mountain Retail Group, Inc.
1234 East 17th Street
Santa Ana, California 92701
Attn: Carl Roude

3. The Landlords currently hold unsecured pre-petition claims, unsecured rejection claims and/or post-petition administrative claims for unpaid rent and other charges. The full amount of each of the Landlords' claims is undetermined at this time.

4. The Landlords have all retained Moldo Davidson to represent them with respect to their interests in connection with the above captioned case. All parties are being billed on a monthly basis at Moldo Davidson's normal hourly rates for its partners, of counsel, associates and legal assistants for time spent and costs incurred in providing legal services.

5. The Landlords are aware of, and have consented to, Moldo Davidson's joint representation of the other clients in this case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 7th day of January, 2009 at Los Angeles, California.

DATED: 01/07/09

MOLDO DAVIDSON FRAIOLI
SEROR & SESTANOVICH LLP

By: 

KENNETH MILLER (CA SBN 126083)

MOLDO DAVIDSON FRAIOLI

SEROR & SESTANOVICH LLP

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Attorneys for The City Portfolio TIC, LLC, KJF/Faris TIC,
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and RMRG Portfolio TIC, LLC

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California; I am over the age of 18 years and am not a party to the within action. I am employed by the law firm of Moldo Davidson Fraioli Seror & Sestanovich LLP, located at 2029 Century Park East, 21st Floor, Los Angeles, California 90067, Telephone: (310) 551-3100, Facsimile: (310) 551-0238.

On **January 12, 2009**, I served the document(s) described as: **VERIFIED STATEMENT OF MULTIPLE CREDITOR REPRESENTATION PURSUANT TO BANKRUPTCY RULE 2019**, on the interested parties in said action by enclosing the document(s) in a sealed envelope addressed as follows:

SEE ATTACHED SERVICE LIST

☒ **BY MAIL:** I caused such envelope(s) with postage thereon, fully prepaid, to be placed in the United States mail. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business.

☐ **BY FEDERAL EXPRESS/EXPRESS MAIL:** I caused said document(s) to be sent via Federal Express / Express Mail for next business day delivery.

☐ **BY FACSIMILE:** I caused said document(s) to be sent via facsimile.

☐ **BY EMAIL:** I caused said document(s) to be sent via email.

☐ **ELECTRONICALLY MAILED:** Said document(s) were electronically served on the person(s) as indicated on the attached Notice of Electronic Filing.

☐ **BY TELEPHONIC COMMUNICATION:** I telephoned the interested parties and gave notice as indicated in my declaration.

☐ **BY PERSONAL SERVICE:** I caused said document(s) to be delivered to the addressees listed on the attached Service List.

☐ **[State]** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ **[Federal]** I declare that I am employed in the offices of a member of the State Bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on **January 12, 2009**, at Los Angeles, California.



Lina Yi

SERVICE LIST

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